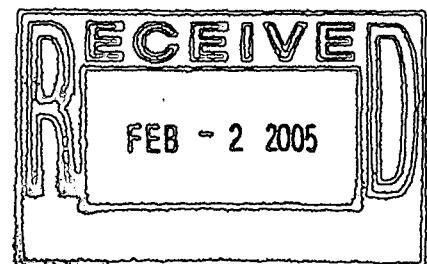


**Closure Description Document  
For RCRA Permitted Container Storage Unit 460.1  
Building 460**

U.S. Department of Energy  
Rocky Flats Environmental Technology Site  
EPA ID No. CO7890010526



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## **1.0 INTRODUCTION**

### **1.1 Purpose and Scope**

Part X of the Rocky Flats Environmental Technology Site's (RFETS or Site's) RCRA Part B Permit, CO-04-06-23-01 addresses closure of permitted units. Closure of a storage unit is subject to the Closure Plan, as described in Part X and to a subsequent Closure Description Document (CDD) that identifies the portions or sections of the Closure Plan that are applicable to the specific permitted unit closure requirements.

This CDD applies to RCRA Container Storage Unit 460.1, Building 460, which includes the highbay of Building 460 and 5 cargo containers on the east side of B460. The RCRA hazardous waste stored at this location was solid wastes generated from previous production buildings. Closure of the highbay portion of the unit will be conducted by an administrative clean closure and closure of the cargo containers will be by removal for disposal.

### **1.2 Unit Closure Notification and Schedule**

The Colorado Department of Public Health and Environment (CDPHE), Hazardous Materials and Waste Management Division is hereby notified of the Site's intent to close the unit identified in Section 4.0. The submittal of this notification is at least 45 days prior to the beginning of closure activities. Closure activities for this unit are expected to begin March 1, 2005. The identified closure activities are expected to be completed within 180 days.

Within 30 days after completion of closure activities a summary report will be submitted to CDPHE containing details about the closure of this portion of the unit.

### **1.3 Facility Contacts**

The contacts for closure activities at RFETS are:

Director

Project Management Division

Rocky Flats Field Office

U.S. Department of Energy

10808 Highway 93, Unit A

Golden, CO 80403-8200

(303) 966-2282

Environmental Manager

Remediation, Industrial  
and Site Services

Kaiser-Hill Company, L.L.C.

10808 Highway 93, Unit B

Golden, CO 80403-8200

(303) 994-6836

## **2.0 METHOD OF CLOSURE AND PERFORMANCE STANDARD**

Permitted Hazardous Waste Container Storage Unit 460.1, described herein will be closed using two methods described in the Site's RCRA Permit, Part X.D.1.a. Unit Review and Inspection, and Part X.D.3., Unit Removal without On-Site Treatment. Clean Closure Option #1 will be used for the highbay area of B460 and Unit Removal will be used for the cargo containers.

Clean closure for the B460 highbay is demonstrated by reviewing the RCRA Operating Record, building files, and other documentation to demonstrate that hazardous was never spilled in the unit or complete documentation exists to demonstrate that releases were adequately cleaned up. A complete operating record exists for this area. Additionally, a visual inspection of the unit confirms the absence of hazardous waste stains and/or residuals.

Removal and disposal as hazardous waste of the secondary containment pans and rollers in the cargo containers will close the cargo container (five) portion of the unit.

The cargoes themselves served as weather structures for the waste and will be released for PU&D or as waste based upon radiological screening.

### **3.0 SYSTEM DESCRIPTION AND WASTE CHARACTERIZATION**

Unit 460.1, in Building 460 is a metal butler type building on a concrete foundation located in the southwest portion of the Site. The building is approximately 148,000 square feet. The footprint of the building is divided into a north area (highbay" and associated offices) of about 94,200 square feet and a south area (office areas) separated by a two-hour fire resistance rated separation wall. The highbay is the RCRA permitted storage unit of the facility. The waste storage capacity of the permitted area is 19,000 55-gallon drum equivalents. Waste containers were stored in Unit 460.1 until treatment or disposal could be arranged. The highbay area was given temporary authorization to store hazardous waste on June 7, 2002; however, the Site did not begin using the unit until September 8, 2002. Ninety-nine percent of the waste stored in this unit was solid; however, five crates with liquid greater than one liter and four crates with incidental liquid were stored in the highbay inside specialized secondary containment pans for ten months, with no spills or releases to the containment.

The EPA waste codes approved for this unit D001-D043, F001-F009, F027, F039, P001-P205, and U001-U404. However, a review of the WEMS database shows that only the following waste codes were stored in the unit: D001-D011, D018, D019, D022, D027, D028, D029, D032-D035, D038-D040, D043, F001-F003, F005-F009, F039, P015, P016, P028-P031, P074, P098, P099, P104, P106, P121, U002-U004, U008, U009, U020, U025, U027, U031, U041, U042, U044, U077-U080, U098, U103, U106, U108, U112, U113, U117, U123, U130, U144, U154, U159-U162, U188, U211, U213, U226, U227, U234, and U239.

A review of the inspection records, spill response records, ECATS, and other site records indicate that one spill occurred in the highbay area of the unit. On January 23, 2003, approximately 2 cups of oil dry released from a non-RCRA-regulated Low Level Waste crate H03228. No rad contamination was identified and the spill was cleaned up immediately. Clean up materials included Kimwipes and K-W solution. There are no visible stains or residues from this incident.

December 2003 through March 2004, five cargo containers (CC1-CC5) were transferred to the eastside Building 460 and added to Part B Permit under Unit 460.1. These cargoes were used originally for container storage at Unit 18.03 (CC46-CC50); however, additional cargo storage was needed at B460 to accommodate the oversized containers generated from the cleanup of Trench 1 and forklift batteries. This was the same waste that was stored in the cargoes at Unit 18.03.

### **4.0 SPECIFIC CLOSURE ACTIVITIES**

Activities will be designed to achieve the closure performance standard, protect human health and the environment, and minimize waste. Specific work instructions will be developed prior to start of closure activities. These instructions will be developed in accordance with applicable RFETS policies and procedures. Closure activities are summarized as follows:

#### **4.1 Waste Inventory Removal**

All waste that was stored in this unit will be removed and shipped offsite for disposal prior to closure activities beginning.

#### **4.2 Establishment of System Boundaries and Scope of Removal**

The boundaries for the RCRA container storage Unit 460.1, Container Storage Area, include the highbay and five cargo containers directly east of Building 460.

#### **5.0 DISPOSITION OF CLOSURE WASTES**

The highbay will not have any waste from the unit to disposition, as this portion is being clean closed. The secondary containment pans and rollers from the cargo containers will be sized reduced as necessary and packaged for disposal as Low-level mixed waste.

#### **6.0 SOIL CONTAMINATION EVALUATION AND POST CLOSURE CARE**

The operating record for this unit (e.g., RCRA inspection logs and occurrence reports) indicates that spills or releases did not extend to the soil underneath the concrete or asphalt slab as a result of waste management in this unit. Closure activities for this unit will not impact the soils surrounding Unit 460.1. Soil contamination will be evaluated as part of remediation activities for building under RFCA and post closure care activities are not necessary as part of the closure of this unit.

#### **7.0 RECORDKEEPING**

The following closure records will be maintained on Site during closure activities and at a federal repository for a minimum of 30 years following the report of closure:

- Records of the volume of hazardous waste generated during closure.
  - Work instructions used to conduct closure activities and documentation verifying closure activities were conducted in accordance with the RCRA Permit and this Closure Description Document.

#### **8.0 AMENDMENT OF THE CLOSURE DESCRIPTION DOCUMENT**

In conducting closure activities, unexpected events that are identified during implementation of closure activities may require an amendment to this Closure Description Document. Modifications to this Closure Description Document will be made in accordance with applicable regulations.

#### **9.0 REFERENCES**

1. Code of Colorado Regulations, Vol. 6, No. 1007-3.
2. Rocky Flats Environmental Technology Site RCRA Permit, Part X: Closure, effective 6/23/2004.

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